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MEMORANDUM AND CONCURRENCE FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING RECORD OF DECISION AT SITE 2 NAS PENSACOLA FL
9/15/2005
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Department of

Memorandum **Environmental Protection**

TO: Mary Jean Yon, Director
Division of Waste Management

THROUGH: Douglas A. Jones, Chief 9/13/05
Bureau of Waste Cleanup

James J. Crane, P.G. Administrator
Federal Programs Section

FROM: Tracie L. Vaught, Project Manager
Federal Programs Section

DATE: September 15, 2005

SUBJECT: Record of Decision, Operable Unit 3, Site 2 Waterfront Sediments, Naval Air Station Pensacola, FL

Attached for your review and signature is a letter of concurrence to Southern Division Naval Facilities Engineering Command regarding the Record of Decision, Operable Unit 3, Site 2, Waterfront Sediments, Naval Air Station (NAS) Pensacola. The Record of Decision presents the selected remedy at Site 2 as No-Action. The selected No-Action alternative requires statutory review be conducted within 5 years after initiation of the remedial action to ensure that the remedy is, or will be protective of human health and the environment.

Operable Unit 3, Site 2, is on the southeastern shoreline of NAS Pensacola, along the Pensacola Bay waterfront sediments. Pensacola Bay is an estuarine body adjacent to the eastern and southern borders of NAS Pensacola in Escambia County, Florida. It includes the Intracoastal Waterway from Trout Point, east to NAS Pensacola Pier 303, and terminates at the mouth of Bayou Grande.

Since the early 1950s, numerous investigations have been conducted in and around the Pensacola Bay System (PBS) to monitor the ecological health of the bay and determine the impact of commercial, industrial, and municipal activities. Previous investigations have documented Naval storm water drains and industrial activities discharging to the Pensacola Bay. The industrial activities stopped discharging to the bay 35 years ago when the sewer no longer discharged to the bay.

Sediment samples collected and analyzed using extraction procedure toxicity methods showed elevated concentrations of lead and chromium. In the 1980s two different sediment sampling events were conducted. The analytical results were inconclusive

due to incorrect analysis of the samples. In 2000 sediment samples were collected to determine if the benthic community was being adversely affected. The investigation was designed and implemented using the Data Quality Process. A total of 11 decision units plus two offsite locations were selected for sampling. The goal of this study was to answer the following question: are chemical constituents in Site 2 sediments creating a condition adverse to benthic communities? Our review of the levels of the chemical constituents of sediments at Site 2 determined that there was no unacceptable risk to benthic communities. Contaminants are expected to continue diminishing through natural processes, since the contaminant source ended more than 35 years ago when the sewer no longer discharged to the bay. Natural processes are expected to reduce toxicity to benthic organisms over time. Therefore, the multiple lines of evidence gathered during the investigation of Site 2 concluded the area is recovering from past Naval Base activities.

The Contaminants of Potential Concern were assessed in the ecological risk assessment evaluation conducted in accordance with the U.S. EPA Risk Assessment Guidance (RAG) for Superfund, U.S. EPA Region 4 Ecological Risk Assessment Bulletins – Supplement to RAGs, U.S. EPA Amended Guidance on Ecological Risk Assessment at Military Bases and the Navy Policy for Conducting Ecological Risk Assessments. The proposed remedial action identified in this document is No-Action. The selected remedy will address conditions that pose a threat to the environment including sediment contamination that may be affecting ecological receptors. Pathways of exposure to humans include dermal contact and ingestion of marine biota that would consume contaminated sediment. Contaminants and toxicity to benthic organisms is expected to reduce through natural processes over time. The range of travel for the affected species of marine biota at this site is limited. In addition to the limited range, Homeland Security restrictions prevent unauthorized boat traffic within 500 feet of the NAS Pensacola shoreline. Therefore human exposure to contaminated sediments at Site 2 is prevented. No excess risk to human health was identified in Site 2.

A Remedial Investigation/Baseline Risk Assessment Addendum (RI/BRA Addendum) was prepared in March 2004. This document summarized the results of previous investigations, discussed the additional investigations, and described the nature and extent of contamination. The document also presented human health and ecological Preliminary Risk Evaluations (PRE) and recommended that Site 2 be designated a No-Action Site. The Department approved the RI/BRA Addendum for No-Action in a letter dated May 6, 2004.

Public notice of the availability of the Proposed Plan was placed in the Pensacola News Journal on March 16, 2005. No changes to the proposed remedy, as originally identified in the Proposed Plan, have been made as a result of public comments.

The Navy and EPA have concluded that No Action is required at this site and have signed the Record of Decision.

I recommend you sign the attached letter of concurrence.

TLV/tlv

Attachments (2)

JJC ESN